William C. Rand, Esq. (WR-7685)
LAW OFFICE OF WILLIAM COUDERT RAND
488 Madison Avenue, Suite 1100
New York, New York 10022
Phone: (212) 286-1425; Fax: (646) 688-3078

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OSAGIE IKIKHUEME, Individually and on Behalf of All Other Persons Similarly Situated,	:	ECF
Plaintiff,	:	13 Civ. 293 (JMF)
-against-	:	
CULINART, INC., MIKE VIOLA, MATTHEW SANTARPIA, and John Does # 1-10,	:	
Defendants.	:	

DECLARATION SECOND OF OSAGIE IKIKHUEME
IN SUPPORT OF MOTION FOR COLLECTIVE ACTION APPROVAL

Dated: New York, New York
May 10, 2013

LAW OFFICE OF WILLIAM COUDERT RAND
William Coudert Rand, Esq.
Attorney for Plaintiff, Individually,
and on Behalf of All Other Persons Similarly Situated
488 Madison Avenue, Suite 1100
New York, New York 10022
Tel: (212) 286-1425

DECLARATION OF PLAINTIFF OSAGIE IKIKHUEME

I, **OSAGIE IKIKHUEME**, hereby declare under penalty of perjury under the laws of the United States of America that the following is true:

1. I was employed full time by CULINART, INC., MIKE VIOLA, and MATHEW SANTARPIA (together "Defendants").

2. From May 1, 2012 until December 21, 2012 I worked as a Sous Chef at Teachers College, Columbia University (the "time period").

3. As a Sous Chef, I did not have any managerial responsibilities.

4. I did not have the right to hire or fire employees and did not direct the activities of two or more other employees.

5. As a Sous Chef, I primarily prepared, cooked and served food.

6. As a Sous Chef, I generally arrived at work at 6:00 a.m. and cooked fish and/or meat, vegetables, and a starch (rice, pasta or potatoes) for approximately 400 people each day.

7. As a Sous Chef, I cooked and prepared the food and set up the food at the food stations by 11:30 a.m.

8. At 11:30 a.m. the cafeteria opened, and from about 11:30 a.m. to 2:30 p.m., I generally went to the food stations and served the food to the customers.

9. After 2:30 p.m. when the cafeteria closed, I cleaned up the food stations and then cut up vegetables for 36 gallons of soup. I then prepared the food for the next day's meal.

10. I also cooked for and prepared food for catered events and also served food at certain catered events.

11. I had no assistant to help me and prepared and cooked the food on my own.

12. It is my understanding that the other Sous Chef employees of Defendants had similar duties and responsibilities and also were not managers.

s/Osagie Ikikhueme

Dated: May 10, 2013

OSAGIE IKIKHUEME

declaration

1 Attachment 32.9KB Save to

32KB

Declaration—Ikikhueme

Save

DECLARATION OF PLAINTIFF OSAGIE IKIKHUEME

I, OSAGIE IKIKHUEME, hereby declare under penalty of perjury under the laws of the United States of America that the following is true:

1. I was employed full time by CULINART, INC., MIKE VIOLA, and MATHEW SANTARPIA (together "Defendants").

2. From May 1, 2012 until December 21, 2012 I worked as a Sous Chef at Teachers College, Columbia University (the "time period").

3. As a Sous Chef, I did not have any managerial responsibilities.

4. I did not have the right to hire or fire employees and did not direct the activities of two or more other employees.

5. As a Sous Chef, I primarily prepared, cooked and served food.

6. As a Sous Chef, I generally arrived at work at 6:00 a.m. and cooked fish and/or meat, vegetables, and a starch (rice, pasta or potatoes) for approximately 400 people each day.

7. As a Sous Chef, I cooked and prepared the food and set up the food at the food stations by 11:30 a.m.

8. At 11:30 a.m. the cafeteria opened, and from about 11:30 a.m. to 2:30 p.m., I generally went to the food stations and served the food to the customers.

9. After 2:30 p.m. when the cafeteria closed, I cleaned up the food stations and then cut up vegetables for 36 gallons of soup. I then prepared the food for the next day's meal.

10. I also cooked for and prepared food for catered events and also served food at certain catered events.

11. I had no assistant to help me and prepared and cooked the food on my own.

12. It is my understanding that the other Sous Chef employees of Defendants had similar duties and responsibilities and also were not managers.

Dated: May 10, 2013

OSAGIE IKIKHUEME

Law Office of William Coudert Rand
488 Madison Avenue, Suite 1100
New York, N.Y. 10022
Phone: (212) 286-1425; Fax (646) 688-3078
wcrand@wcrand.com